

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

In re:

deeproot Capital Management, LLC, *et al.*,¹

Debtors.

Chapter 7

Case No. 21-51523 (MMP)

(Jointly Administered)

NOTICE OF HEARING

PLEASE TAKE NOTICE that on August 24, 2022, Cycladic International, LLC, (“*Cycladic International*”), Cycladic, LLC (“*Cycladic*”), and Thomas N. Andrew (“*Andrew*” and together with Cycladic International and Cycladic, the “*Movants*”) filed their *Expedited Motion to Quash Bankruptcy Rule 2004 Examination Notices with Subpoena Duces Tecum* [Dkt. No. 137] (the “*Motion to Quash*”).

PLEASE TAKE FURTHER NOTICE that a hearing to consider and act upon the Motion to Quash has been scheduled for an expedited hearing to occur on **September 1, 2022** at **10:30 a.m.** (**CST**) (the “*Hearing*”) in Courtroom No. 1, Third Floor, 615 E. Houston Street, San Antonio, Texas. See Dkt. No. 140.

PLEASE TAKE FURTHER NOTICE that parties not wishing to appear at the Hearing in person should contact the Court’s Courtroom Deputy, Deanna Castleberry, by either telephone at (210) 472-6720 EXT. 5735, or by email at deanna_castleberry@txwb.uscourts.gov to appear at the Hearing via telephone or Webex.

¹ The administratively consolidated chapter 7 cases, along with their respective case numbers and the last four digits of each Debtor’s federal tax identification number, are: *In re Policy Services, Inc.*, 21-51513 (2864), *In re Wizard Mode Media, LLC*, 21-51514 (3205), *In re deeproot Pinball LLC*, 21-51515 (0320), *In re deeproot Growth Runs Deep Fund, LLC*, 21-51516 (8046), *In re deeproot 575 Fund, LLC*, 21-51517 (9404), *In re deeproot 3 Year Bonus Income Debenture Fund, LLC*, 21-51518 (7731), *In re deeproot Bonus Growth 5 Year Debenture Fund, LLC*, 21-51519 (9661), *In re deeproot Tech LLC*, 21-51520 (9043), *In re deeproot Funds LLC*, 21-51521 (9404), *In re deeproot Studios LLC*, 21-51522 (6283), and *In re deeproot Capital Management, LLC*, 21-51523 (2638).

DATED August 29, 2022.

Respectfully Submitted,

/s/ Stephen J. Humeniuk

Stephen J. Humeniuk (Texas Bar No. 24087770)
LOCKE LORD LLP
600 Congress Ave., Suite 2200
Austin, TX 78701
Telephone: (512) 305-4700
Facsimile: (512) 305-4800
stephen.humeniuk@lockelord.com

Thomas J. Cunningham (*pro hac vice* forthcoming)
LOCKE LORD LLP
777 South Flagler Drive – East Tower Suite 215
West Palm Beach, FL 33401
561-820-0201
tcunningham@lockelord.com

Michael B. Kind (*pro hac vice* forthcoming)
LOCKE LORD LLP
111 South Wacker Drive
Chicago, IL 60606
Telephone: (312) 443-0700
Facsimile: (855) 595-1192
michael.kind@lockelord.com

***Counsel for Cycladic International, LLC;
Cycladic, LLC; and Thomas N. Andrew***

CERTIFICATE OF SERVICE

The undersigned certifies that on August 29, 2022, in accordance with the Court's Order dated August 26, 2022, *see* Dkt. No. 140, true and correct copies of the foregoing were forwarded to all parties receiving electronic notification in this case from the Court's electronic case filing (ECF) system, including the parties identified immediately below, or as otherwise specified below:

Via Counsel Via CM/ECF:

catherinecurtis@wickphillips.com;
jason.rudd@wickphillips.com

Policy Services, Inc.
deeproot Pinball, LLC
deeproot Growth Runs Deep Fund, LLC
deeproot 575 Fund, LLC
deeproot 3 Year Bonus Income Fund, LLC
deeproot BonusGrowth 5 Year Debenture Fund, LLC
deeproot Tech, LLC
deeproot Funds, LLC
deeproot Studios, LLC
deeproot Capital Management, LLC
12621 Silicon Dr.
San Antonio, TX 78249

Via Counsel Via CM/ECF:

catherinecurtis@wickphillips.com;
jason.rudd@wickphillips.com
Mode Media, LLC
12227 S. Business Park Drive, Suite 130
Draper, UT 84020

Via CM/ECF: pat.lowe.law@gmail.com

John Patrick Lowe
Chapter 7 Trustee
2402 East Main Street
Uvalde, TX 78801

Via CM/ECF: rpulman@pulmanlaw.com

Randall A. Pulman
Pulman Cappuccio & Pullen, LLP
2161 NW Military Hwy., Suite 400
San Antonio, TX 78213

Via CM/ECF:

USTPRegion07.SN.ECF@usdoj.gov
Aubrey.thomas@usdoj.gov
United States Trustee – SA12
US Trustee's Office (Aubrey Thomas)
615 E. Houston, Suite 533
San Antonio, TX 78295-1539

Via CM/ECF: don.stecker@lgbs.com

Don Stecker Linebarger Goggan et al.
112 E. Pecan, Suite 2200
San Antonio, TX 78205

Via CM/ECF: rbattaglia@outlook.com

Raymond W. Battaglia
LAW OFFICES OF RAY BATTAGLIA,
PLLC
66 Granburg Circle
San Antonio, TX 78218

Via CM/ECF: jpetree@mcslaw.com

Jonathan Petree
MCGUIRE, CRADDOCK & STROTHER,
P.C.
500 N. Akard Street Suite 2200
Dallas, TX 75201

Via CM/ECF: jdunne@smfadlaw.com

John C. Dunne
SHANNON, MARTIN et al.
1001 McKinney Street #1100
Houston, TX 77002

Via CM/ECF: bk-cmurphy@oag.texas.gov

Texas Workforce Commission
c/o Christopher S. Murphy
TEXAS ATTORNEY GENERAL'S OFFICE
PO Box 12548
Austin, TX 78711

Via CM/ECF:

catherine.curtis@wickphillips.com;
jason.rudd@wickphillips.com
Catherine A. Curtis/Jason M. Rudd
WICK PHILLIPS GOULD & MARTIN, LLP
3131 McKinney Ave, Suite 500
Dallas, TX 75204

Via CM/ECF: pastry@branscomblaw.com

Patrick H. Autry
BRANSCOMB PLLC
4630 N. Loop 1604 West, Suite 206
San Antonio, TX 78249

Via CM/ECF: lmjurek@jureklaw.com

Lynne M. Jurek
THE JUREK LAW GROUP, PLLC
4309 Yoakum Blvd.
Houston, TX 77006

Via U.S. Mail, First Class:

deeproot Capital Management, LLC
12621 Silicon Dr.
San Antonio, TX 78249

/s/ Stephen J. Humeniuk

Stephen J. Humeniuk